

EXHIBIT E

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to:

Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03 Civ. 9849

Federal Insurance Co., et al. v. Al Qaida, et al., No. 03 Civ. 6978

Euro Brokers Inc., et al., v. Al Baraka, et al., No. 04 Civ. 7279

**PLAINTIFFS' FIRST SET OF JURISDICTIONAL REQUESTS FOR PRODUCTION OF
DOCUMENTS DIRECTED TO ABDULLAH AL OBAID**

THE MDL 1570 PLAINTIFFS'
EXECUTIVE COMMITTEES
August 22, 2013

23. Please provide all documents authored, generated, or drafted by You during Your tenure as an official representative of the Charities and/or Saudi Arabian government, which describe, detail, or otherwise relate to the organizations' financial performance. Responsive documents shall include all financial reports or executive summaries submitted by You to: the Kingdom of Saudi Arabia; members of the Saudi royal family; the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Da'wah and Guidance; the Ministry of Foreign Affairs, Endowments, Da'wah and Guidance; and/or the Charities' governing bodies, including but not limited to, the MWL Constituent Council, the MWL General Secretariat, the IIRO Executive Council (a/k/a Board of Directors), and the IIRO Executive Committee.

ANSWER:

24. Please provide all documents relating to any delegation, commission, task force, or group You participated in during Your tenure as an official representative of the Charities and/or Saudi Arabian government, to assess conditions and needs both within the Kingdom of Saudi Arabia and in other foreign countries, including without limitation, Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Russia, Sudan, Somalia, Tanzania, Turkey, United States, and Yemen. Responsive documents shall include, but are not limited to, copies of Your passports, visas, or other documents authorizing Your entry into those countries.

ANSWER:

95. Please provide all documents You and/or the Charities sent to, and/or received from, the persons and/or entities identified in Attachment A, including without limitation, all documents relating to the transfer of funds between You and/or the Charities and those persons and/or entities.

ANSWER:

96. From the period beginning January 1, 1988 through 1997, please provide all documents relating to any trips you took to Sudan.

ANSWER:

97. From the period beginning January 1, 1988 through 2002, please provide all documents relating to any trips you took to Afghanistan.

ANSWER:

98. Please provide all documents relating to any business, employment, financial, charitable, religious, or other relationship between You and/or the Charities and Mohammed Jamal Khalifa (a/k/a Abu Bara). Responsive documents shall include, but are not limited to, Khalifa's personnel or employment files.

ANSWER:

102. Please provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with Khalifa or Jelaidan, including any individual or entity affiliated with those individuals, as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

103. Please provide all documents relating to any business, employment, financial, charitable, religious, or other relationship between You and/or the Charities and any of the Golden Chain-Related Individuals, and/or any individual or entity associated therewith.

ANSWER:

104. Please provide all documents You and/or the Charities sent to, and/or received from, any of the Golden Chain-Related-Individuals, including without limitation, all documents relating to the transfer of funds between You and/or the Charities and the any of the Golden Chain-Related-Individuals, and/or any individual or entity associated therewith.

ANSWER:

105. Please provide all documents relating to any accounts in any banking or financial institution You hold or held jointly with, or on behalf of any of the Golden Chain-Related-

Individuals, and/or any individual or entity associated therewith, including any accounts over which You hold or have held signatory authority.

ANSWER:

106. Please provide all documents relating to any accounts in any banking or financial institution any of the Golden Chain-Related-Individuals, and/or any individual or entity associated therewith, hold or held jointly with, or on behalf of the Charities, including any accounts over which the Golden Chain-Related-Individuals hold or have held signatory authority.

ANSWER:

107. Please provide all documents relating to any investigations or inquiries conducted by any United States Investigator, Foreign Investigator, or KSA Investigator, into financial transactions linked to accounts held solely or jointly by any of the Golden Chain-Related-Individuals, and/or any individual or entity associated therewith.

ANSWER:

108. Please provide all documents relating to any decision to terminate any relationship with any of the Golden Chain-Related-Individuals, and/or any individual or entity associated therewith, as a result of financial irregularities, suspicious activities, investigations